

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13
Saeed Ahmed-Moghal :
Debtor : Case No.: 16-16445

Saeed Ahmed-Moghal :
Movant :

MOTION TO APPROVE SALE IN CHAPTER 13 CASE

NOW COMES, Saeed Ahmed-Moghal, ("Debtor" and "Movant") by and through his attorney, Jason M. Rapa, Esquire, pursuant to 11 U.S.C. § 363 (b) and Federal Rules of Bankruptcy Procedure 6004 and 9014 to request that this Court enter an order approving the sale of property located at 230 North Church St., Allentown, PA. In support of this motion, the Debtor states:

1. Movant is Saeed Ahmed-Moghal of 1420 W. Walnut St., Allentown, PA. The Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code on September 13, 2016 .
2. The property is subject to the following mortgages, judicial liens and/or nonpossessory, nonpurchase-money security interests:

a.	Lehigh County Tax Claim POC#2-1	\$2,541.26
b.	City of Allentown POC# 5-1	\$1,917.61
c.	Allentown S.D. & Public Asset POC# 6-1	\$10,580.43
3. Debtor has received an offer on the property of 230 North Church St., Allentown, PA. Attached, marked as EXHIBIT A, and made part of this motion is a correct copy of said offer in the amount of \$55,000.00 with an expected closing date of December 29, 2017.
4. Adding the total of the liens of \$15,039.30 and total realtor fees of \$3,300.00 of the \$55,000.00 offer. Attached, marked as Exhibit B is the Listing Contract providing the Broker fee of 6%. Sellers Realtor is Cindy Browne of Keller Williams Real Estate, 2901 Emrick, Blvd Ste 100 Bethlehem, PA 18020 Phone number of 610-867-8888
5. After the total exemption and debtor's interest in the property, there is sufficient profit to pay any remaining plan payments (lump sum distribution as a plan modification).
6. A request is made concerning attorney fees and costs are included in this motion in the amount of \$1,500.00 to be made payable from the sale proceeds.

7. The sale is in the best interest of the estate, the debtor, creditors, and all parties in interest.

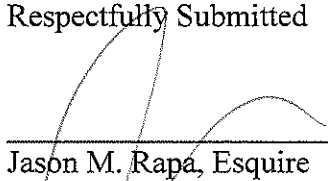
8. Notice to all creditors is indicated.

9. The purchase price is optimal under the overall circumstances of the case.

WHEREFORE, the Debtor respectfully requests that this Court enter an order which:

1. Allows the sale of property located at 230 North Church St., Allentown, PA to the attached purchase offer.
2. Allows the payment of all required and customary closing charges including taxes and utilities in a prorated basis.
3. Allows for the payment of a 6% realtor's commission to Cindy Browne of Keller Williams Real Estate, 2901 Emrick, Blvd Ste 100 Bethlehem, PA 18020
4. Allows for payment of \$1,500 to Debtor's counsel for legal services associated with this motion.

Respectfully Submitted



Jason M. Rapa, Esquire
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